

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JOHN BOSHEARS, on behalf of himself and  
all others similarly situated,

Plaintiff,

v.

PEOPLECONNECT, INC., a Delaware  
corporation,

Defendant.

NO. 2:21-cv-01222-MJP

STIPULATED MOTION AND ORDER  
FOR EXTENSION OF DEADLINES

NOTE ON MOTION CALENDAR:  
December 6, 2021

The Parties respectfully move for an agreed briefing schedule for Defendant's motion to dismiss and motion to stay. In support of this motion, the Parties state as follows:

1. On October 29, 2021, Plaintiff's counsel filed an Amended Complaint substituting John Boshears as the named plaintiff in place of Mr. Fry. (Dkt. No. 17.)

2. On November 2, 2021, this Court entered an Order extending Defendant's deadline to answer or otherwise respond to Plaintiff's Amended Complaint to December 13, 2021. (Dkt. No. 19.)

1           3.       Because of competing prior obligations in a number of matters for both Parties,  
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3 the Parties have agreed to extend Defendant's deadline to file its motion to dismiss Plaintiff's  
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5 Amended Complaint to December 20, 2021.  
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7           4.       Separately, Defendant also will be filing a motion to stay discovery on December  
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9 20, 2021.  
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11           5.       The Parties agree that Plaintiff will have until January 14, 2022, to respond to  
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13 Defendant's motion to dismiss and respond to Defendant's motion to stay discovery.  
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15           6.       The Parties also agree that Defendant will have until January 21, 2022, to file its  
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17 reply briefs in support of its motion to dismiss and to its motion to stay discovery.  
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19           WHEREFORE, for the reasons stated herein, the parties respectfully request that the  
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21 Court grant this motion and enter an Order extending the deadline for Defendant to respond to  
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23 Plaintiff's Amended Complaint up to and including December 20, 2021, Plaintiff to file an  
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25 opposition to both Defendant's motion to dismiss and motion to stay discovery up to and  
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27 including January 14, 2022, and for Defendant to file its reply briefs in support of its motion to  
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29 dismiss and its motion to stay discovery, up to and including January 21, 2022.  
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31           [SIGNATURES ON FOLLOWING PAGE]  
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DATED this 6th day of December, 2021.

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## ORDER

Although the Parties provide a threadbare justification for the requested extension, the Court GRANTS the brief extension of time. No further extensions of these deadlines shall be considered absent extraordinary circumstances.

DATED: December 6, 2021



Marsha J. Pechman  
United States Senior District Judge